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17 Comcast Corporation, NBCUniversal Media,  
18 LLC, and MSNBC Cable L.L.C.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

19 HERRING NETWORKS, INC.,

20 Plaintiff,

21 v.

22 RACHEL MADDOW; COMCAST  
23 CORPORATION; NBCUNIVERSAL  
24 MEDIA, LLC; and MSNBC CABLE  
25 L.L.C.,

26 Defendants.

27 CASE NO. 19-cv-1713-BAS-AHG

28 **JOINT MOTION AND STIPULATION  
TO EXTEND DEFENDANTS' TIME  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

Action Filed: September 9, 2019

Judge: Hon. Cynthia Bashant

TO THE COURT AND THE CLERK OF COURT, PLEASE TAKE NOTICE  
THAT Plaintiff Herring Networks, Inc. (“Plaintiff”) and Defendants Rachel Maddow,  
Comcast Corporation, NBCUniversal Media, LLC, and MSNBC Cable L.L.C.  
 (“Defendants”) (together with Plaintiff, the “Parties”), by and through their respective  
counsel of record, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its Complaint (Dkt. 1) in the above-captioned action on September 9, 2019;

WHEREAS, Defendants Comcast Corporation, NBCUniversal Media, LLC, and MSNBC Cable L.L.C. were served with the Complaint on September 12, 2019;

WHEREAS, Defendant Rachel Maddow was served with the Complaint on September 20, 2019;

WHEREAS, the Parties have stipulated to an extension of the deadline for all Defendants to answer, move, or otherwise respond to the Complaint up to and including October 21, 2019;

WHEREAS, the Parties have agreed to meet and confer pursuant to Rule 4.A. of this Court's Standing Order for Civil Cases by October 8, 2019 regarding any motions Defendants intend to bring in response to the Complaint;

WHEREAS, Defendants reserve all rights and defenses and waive none;

WHEREAS, Local Civil Rule 7.2(b) permits the Parties to file this Stipulation as a joint motion;

WHEREAS, the stipulated extension would not affect any current deadlines already fixed by the Court;

NOW THEREFORE, the Parties hereby stipulate that Defendants shall have up to and including October 21, 2019, to answer, move, or otherwise respond to the Complaint.

\* \* \*

## IT IS SO STIPULATED.

DATED: October 2, 2019

## GIBSON, DUNN & CRUTCHER LLP

By: /s/ Scott A. Edelman  
Scott A. Edelman

Attorneys for Defendants Rachel Maddow, Comcast Corporation, NBCUniversal Media, LLC, and MSNBC Cable L.L.C.

DATED: October 2, 2019

MILLER BARONDESS, LLP  
Louis R. Miller  
Amnon Z. Siegel

By: /s/ Amnon Z. Siegel  
Amnon Z. Siegel

Attorneys for Plaintiff Herring Networks, Inc.